ORAL ARGUMENT NOT YET SCHEDULED

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

STARBUCKS CORPORATION d/b/a STARBUCKS COFFEE COMPANY,

No. 24-1123

Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent.

WORKERS UNITED'S MOTION FOR LEAVE TO INTERVENE IN SUPPORT OF RESPONDENT NATIONAL LABOR RELATIONS BOARD

Pursuant to Federal Rule of Appellate Procedure 15(d), Workers United, affiliated with Service Employees International Union (Workers United), moves for leave to intervene in support of Respondent National Labor Relations Board (NLRB)'s anticipated opposition to Starbucks Corporation (Starbucks)'s Petition to Review. Counsel for Workers United has contacted counsel for Petitioner Starbucks and Respondent NLRB. Counsel for the NLRB have stated they do not oppose this motion. As of the time of this motion's filing, counsel for Starbucks has not indicated whether or not it opposes Workers United's request to intervene.

Workers United's interest in this case is that it is the certified bargaining representative of a unit of employees employed by Petitioner Starbucks, and was the

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successful charging party in the NLRB proceedings under review. Workers United's grounds for intervention are that, as a successful charging party before the NLRB, Workers United is entitled under *International Union, United Automobile, Aerospace and Agricultural Implement Workers of America, AFL-CIO v. Scofield*, 382 U.S. 205, 86 S.Ct. 373 (1965), to intervene in this proceeding. Workers United therefore requests that this Court grant its motion for leave to intervene in support of Respondent NLRB.

Respectfully submitted this 4th day of June, 2024.

/s/Dmitri Iglitzin

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Attorney for Workers United, affiliated with Service Employees International Union

CERTIFICATE OF SERVICE

I hereby certify that the foregoing WORKERS UNITED'S MOTION FOR LEAVE TO INTERVENE IN SUPPORT OF RESPONDENT NATIONAL LABOR RELATIONS BOARD and RULE 26.1 DISCLOSURE STATEMENT was served on the date noted below through the Court's CM/ECF system on all registered counsel.

Dated this 4th day of June, 2024.

/s/Dmitri Iglitzin

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RULE 26.1 DISCLOSURE STATEMENT

Pursuant to Fed. R. App. P. 26.1 and Circuit Rule 26.1, movant Workers United, affiliated with Service Employees International Union, provides the following corporate disclosure statement:

The above-named movant is a is a labor organization that does not have a parent corporation, and no publicly-held corporation owns ten percent or more stock in Workers United.

DATED this 4th day of June, 2024.

/s/Dmitri Iglitzin

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